

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

DON GIBSON, et al., individually and on	)	
behalf of similarly situated individuals,	)	
	)	
<i>Plaintiffs,</i>	)	Case No. 4:23-CV-00788
	)	[Consolidated with 4:23-CV-00945]
v.	)	
	)	Hon. Stephen R. Bough
NATIONAL ASSOCIATION OF	)	
REALTORS, et al.,	)	
	)	
<i>Defendants.</i>	)	
	)	

**NOTICE OF SETTLEMENT IN PRINCIPLE AND JOINT MOTION  
TO STAY CASE AS TO REAL ESTATE ONE, INC.**

Don Gibson, Lauren Criss, John Meiners, and Daniel Umpa (collectively, “Plaintiffs”) and Defendant Real Estate One, Inc. (together with Plaintiffs, the “Parties”) respectfully provide notice to the Court that the Parties have reached a settlement in principle to settle all claims asserted against Real Estate One, Inc. in the above-captioned consolidated action as part of a proposed nationwide class settlement. This agreement is subject to the Court’s approval under Federal Rule of Civil Procedure 23.

The Parties hereby jointly stipulate and request that the Court stay all deadlines and proceedings solely as to Real Estate One, Inc. to preserve the resources of Plaintiffs, Real Estate One, Inc., and the Court, and to seek preliminary and final approval of the settlement.

The Parties agree that this Notice and the stay requested herein shall not constitute a waiver of any defenses, including but not limited to: (a) any jurisdictional defenses that may be available under Rule 12 of the Federal Rules of Civil Procedure, statutory law, or common law (including but not limited to personal jurisdiction defenses), (b) any affirmative defenses that may be

available under Rule 8 of the Federal Rules of Civil Procedure, statutory law, or common law, or  
(c) any other statutory or common law defenses that may be available to Defendant in this or any  
other related actions.

Dated: October 1, 2024

By: /s/ Robert A. Braun

Benjamin D. Brown (*pro hac vice*)  
bbrown@cohenmilstein.com  
Robert A. Braun (*pro hac vice*)  
rbraun@cohenmilstein.com  
Sabrina Merold (*pro hac vice*)  
smerold@cohenmilstein.com  
COHEN MILSTEIN SELLERS & TOLL PLLC  
1100 New York Ave. NW, Fifth Floor  
Washington, DC 20005  
Telephone: (202) 408-4600

Daniel Silverman (*pro hac vice*)  
dsilverman@cohenmilstein.com  
COHEN MILSTEIN SELLERS & TOLL PLLC  
769 Centre Street, Suite 207  
Boston, MA 02130  
Telephone: (617) 858-1990

Steve W. Berman (*pro hac vice*)  
steve@hbsslaw.com  
HAGENS BERMAN SOBOL SHAPIRO LLP  
1301 Second Avenue, Suite 2000  
Seattle, WA 98101  
Telephone: (206) 623-7292

Rio S. Pierce (*pro hac vice*)  
riop@hbsslaw.com  
HAGENS BERMAN SOBOL SHAPIRO LLP  
715 Hearst Avenue, Suite 202  
Berkeley, CA 94710  
Telephone: (510) 725-3000

Nathan Emmons (Mo. Bar. No. 70046)  
nathane@hbsslaw.com  
Jeannie Evans (*pro hac vice*)  
jeannie@hbsslaw.com

HAGENS BERMAN SOBOL SHAPIRO LLP  
455 North Cityfront Plaza Drive, Suite 2410  
Chicago, IL 60611  
Telephone: (708) 628-4949

Marc M. Seltzer (*pro hac vice*)  
mseltzer@susmangodfrey.com  
Steven G. Sklaver (*pro hac vice*)  
ssklaver@susmangodfrey.com  
SUSMAN GODFREY L.L.P.  
1900 Avenue of the Stars, Suite 1400  
Los Angeles, California 90067  
Telephone: (310) 789-3100

Beatrice C. Franklin (*pro hac vice*)  
bfranklin@susmangodfrey.com  
SUSMAN GODFREY L.L.P.  
1301 Avenue of the Americas 32nd Floor  
New York, New York 10019  
Telephone: (212) 336-8330

Matthew R. Berry (*pro hac vice*)  
mberry@susmangodfrey.com  
Floyd G. Short (*pro hac vice*)  
fshort@susmangodfrey.com  
Alexander W. Aiken (*pro hac vice*)  
aaiken@susmangodfrey.com  
SUSMAN GODFREY L.L.P.  
401 Union St., Suite 3000  
Seattle, Washington 98101  
Telephone: (206) 516-3880

Michael S. Ketchmark MO # 41018  
Scott A. McCreight MO # 44002  
Ben H. Fadler MO # 56588  
KETCHMARK & MCCREIGHT  
11161 Overbrook Road, Suite 210  
Leawood, KS 66211  
Telephone: (913) 266-4500  
Fax: (913) 317-5030  
mike@ketchmclaw.com  
smccreight@ketchmclaw.com  
bfadler@ketchmclaw.com

Brandon J.B. Boulware MO # 54150  
Jeremy M. Suhr MO # 60075

BOULWARE LAW LLC  
1600 Genessee, Suite 416  
Kansas City, MO 64102  
Tele: (816) 492-2826  
Fax: (816) 492-2826  
brandon@boulware-law.com  
jeremy@boulware-law.com

Matthew L. Dameron MO # 52093  
Eric L. Dirks MO # 54921  
WILLIAMS DIRKS DAMERON LLC  
1100 Main Street, Suite 2600  
Kansas City, MO 64105  
Telephone: (816) 945-7110  
Fax: (816) 945-7118 matt@williamsdirks.com  
dirks@williamsdirks.com

***Attorneys for Plaintiffs***

By: /s/ Howard B. Iwrey  
Howard B. Iwrey (*pro hac vice*)  
DYKEMA GOSSETT PLLC  
39577 Woodward Avenue, Suite 300  
Bloomfield Hills, MI 48304  
Telephone: (248) 203-0700  
hiwrey@dykema.com

Thomas B. Alleman MO #28297  
DYKEMA GOSSETT PLLC  
1717 Main, Suite 4200  
Dallas, Texas 75201  
Telephone: (214) 698-7830  
Fax: (855) 216-6218  
talleman@dykema.com

Cody D. Rockey (*pro hac vice*)  
DYKEMA GOSSETT PLLC  
2723 South State Street, Suite 400  
Ann Arbor, MI 48104  
Telephone: (734) 214-7660  
crockey@dykema.com

***Attorneys for Defendant Real Estate One, Inc.***

**CERTIFICATE OF SERVICE**

I hereby certify that on October 1, 2024, a copy of the foregoing document was electronically filed through the ECF system and will be sent electronically to all persons identified on the Notice of Electronic Filing.

By: /s/ Robert A. Braun